

REMARKS

Claims 1-40 are pending in the present application. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested in light of the following remarks.

Applicant notes with appreciation the indication that claims 8 and 19 are allowable over the prior art of record if rewritten in independent form.

Claims 1-7, 9-18 and 20-40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Chiu et al (U.S. Patent No. 6,597,689)<sup>1</sup>. Claims 26-28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Chiu et al as applied to claims 1 and 12 above, and further in view of Swerdlow (U.S. Patent No. 5,995,504). These rejections are respectfully traversed for the following reasons.

Claim 1 recites an interface device for providing a gateway function between lines of a public switched telephone network (PSTN) that carry digital hierarchy signals in a plurality of digital hierarchies and an asynchronous transfer mode (ATM) backbone network that carries signals in ATM format. The interface device includes, *inter alia*, a telephony transceiver operative to receive upstream digital

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<sup>1</sup> Claims 26-28 are listed in the opening paragraph of paragraph 2 on page 2 of the Office Action. However, these claims are not discussed in the body

hierarchy signals in a plurality of digital hierarchies from the PSTN, a hierarchy converter operatively associated with the telephony transceiver and operative to convert at least some of the upstream digital hierarchy signals in a plurality of digital hierarchies to upstream signals in a single digital hierarchy distributed over a plurality of logical channels, an inverse multiplexing unit operatively associated with the hierarchy converter and operative to inverse-multiplex the upstream signals in the single digital hierarchy distributed over a plurality of logical channels thereby to form upstream inverse-multiplexed digital hierarchy signals, an ATM framer operatively associated with the inverse multiplexing unit and operative to map at least some of the upstream inverse-multiplexed digital hierarchy signals into ATM cells thereby to form upstream signals in ATM format, and an ATM transceiver operatively associated with the ATM framer and operative to transmit said upstream signals in ATM format to the ATM backbone network. This is not taught, disclosed or made obvious by the prior art of record.

Applicant respectfully submits that the Office Action does not take into account main features of the present invention which distinguish the present invention from Chiu.

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of the rejection, and instead are rejected in paragraph 3 of the Office Action on page 9. Clarification is respectfully requested.

Chiu is very clearly directed to an open access system which is directed to provide virtual connections in an ATM network

regardless of whether the communication lines coupled to the inputs and outputs ... are based on SVC, PVC, ... the IMAS can support SVCs for a more flexible, timely, efficient and manageable connection. In the more typical configuration, the loop side of the IMAS is PVC-based ... and the telecommunications backbone side is capable of supporting SVC signaling logic. With SVC support, the IMAS assists the ATM network in hand crafting an SVC-based connection almost immediately between end users when the originating end user wants to make a call to a destination end user, and tear down that virtual connection almost immediately when that call is completed. (lines 3-17 of the abstract).

In other words, the apparatus described by Chiu is directed to the creation of a logical connection in an ATM network preferably between two end users. However, contrary to the assertion in various places of the Office Action, Chiu does not provide or disclose a gateway function between the lines of the public switched telephone network 'PSTN' ... and 'ATM' backbone network that carries signals in ATM format. In fact, the Office Action refers to Fig. 1 of Chiu to attempt to support the argument. However, it is clearly seen from that very same Fig. that when a voice communication arrives at DSLAM 101, the IMAS, it is redirected to the PSTN (col. 16,

lines 31-34), which is not part of the network that the Chiu patent deals with.

Furthermore, in a number of places, the Office Action repeats the sentence that "Chiu fails to explicitly disclose about receiving "digital hierarchy signals from PSTN." Applicant respectfully disagrees. The way the examiner tries to overcome this obstacle is by stating that "however Chiu does disclose whether in other loop technologies besides xDSL technology family such as DS3, OC-3C, OC-12". This statement seems to suggest that there is a misunderstanding of the present invention. According to our invention a non-ATM signals (the digital hierarchy signals from the PSTN) is conveyed through a pipe, which could also be DS3, OC-3C etc. and arrive at the interface of the present invention where they are conveyed into an ATM format. In contrast, the signals of Chiu are conveyed in their already ATM format through such pipes (DS3 etc.), but naturally, no conversion takes place since they are already in their ATM format.

Thus, as opposed to the teaching of Chiu, the problem which the present invention seeks to solve, is, to provide a gateway between PSTN and an ATM network, one of which is capable of converting traffic that arrives at the device of the invention along the PSTN network, into logical

channels (i.e. into ATM format) which are adapted for conveyance along the ATM network. For at least these reasons, Applicant respectfully submits that claim 1 is patentable over the prior art.

Applicant respectfully submits that claims 2-7 and 9-11 are patentable in and of themselves and as they depend from and include the recitations of claim 1, which is patentable for the reasons discussed above.

Claims 12-18 and 20-40 are believed to be patentable at least for the reasons discussed above with respect to claim 1. Applicant respectfully submits that Swerdlow adds nothing to remedy the deficiencies noted above with respect to Chiu et al.

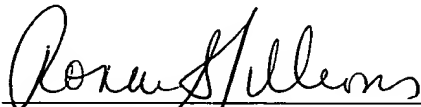
In view of the above amendments and remarks, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of record. Applicant submits that the application is in condition for allowance and early notice to this effect is most earnestly solicited.

If the Examiner has any questions he is invited to contact the undersigned at 202-628-5197.

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Respectfully submitted,

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